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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re:

ROSEMARY KEMMERLE  
TIMOTHY KEMMERLE

Debtors.

Chapter 13

Case No. 15-32341

Hon. Jerrold N. Poslusny, Jr.

Hearing Date:

**NOTICE OF MOTION TO APPROVE LOAN MODIFICATION AGREEMENT**

**Isabel Balboa, Chapter 13 Trustee**  
**535 Route 38, Ste. 580**  
**Cherry Hill, New Jersey 08002**

**Nationstar Mortgage, LLC**  
**8950 Cyroress Waters Blvd.**  
**Coppell, TX 75019**

**KML Law Group, P.C.**  
**216 Haddon Ave., Suite 406**  
**Westmont, NJ 08108**

**Rosemary & Timothy Kemmerle**  
**480 Willow Drive**  
**Cinnaminson, NJ 08077**

**PLEASE TAKE NOTICE** that the undersigned, Attorneys for the Debtors, Rosemary and Timothy Kemmerle shall move before the Honorable Jerrold N. Poslusny, Jr, U.S.B.J. at the United States Bankruptcy Court, 401 Market Street, Camden, New Jersey on, at 10:00AM

or as soon thereafter as counsel can be heard, for the entry of an Order Approving Loan Modification Agreement.

**PLEASE TAKE FURTHER NOTICE** that if you wish to contest the within Motion you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve the undersigned within seven (7) days in advance of the aforesaid hearing responding papers stating with particularity the basis of your opposition to the within Motion.

As the facts and/or law the Debtors rely upon, as set forth in the accompanying Motion, and basis for said Motion, do not present complicated or unique questions, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, movant shall rely upon the attached certification.

A proposed form of Order is filed and served herewith.

Movant requests oral argument only if written opposition is timely filed and served.

Submitted by,

/s/Daniel A. Frischberg

Date: September 20, 2016

Counsel for Debtor